

STATE OF WISCONSIN

CIRCUIT COURT

JEFFERSON COUNTY

STATE OF WISCONSIN

Plaintiff,

CRIMINAL COMPLAINT

vs.

CHARISSE ELIZABETH DANIELS

Circuit Court Case No: 18CF466

1510 Utah Street
Watertown, WI 53094

FILED

[REDACTED]

DEC 14 2018

Sex/Race: Black/Female,

Defendant.

Jefferson County
Circuit Court

THE COMPLAINING WITNESS, SERGEANT LEON RUDER, BEING FIRST DULY SWORN STATES THAT:

FALSIFICATION OF INFORMATION REGARDING A NOMINATION PAPER

On and between May 10, 2018 and June 1, 2018, in the City of Watertown, Jefferson County, Wisconsin, the defendant, Charisse Daniels, did falsify information regarding nomination papers, to wit: did certify that the persons listed on the papers had personally signed and that she had personally obtained all of the signatures on ten pages of nomination papers for herself, Charisse Daniels, for Representative to the Assembly – 37th District, when in fact she had not obtained all the signatures and not all the persons had signed the forms, in violation of Wis. Stat. §§ 12.13(3)(a) and 12.60(1)(a).

Upon conviction of this offense, a class I felony, the defendant may be fined not more than \$10,000 or imprisoned for not more than 3 years and 6 months, or both.

FACTUAL BASIS

The above-named complaining witness is a City of Watertown Police Detective Sergeant and bases this complaint upon information and belief that:

I am currently employed as a detective sergeant with the Watertown Police Department. As part of my duties with the Watertown Police Department, I supervise the work of other detectives in the department. Detective Tim Wacker of the Watertown Police department was assigned investigate allegations of fraud related to the nomination papers of Charisse Daniels for Representative in the 37th

Assembly District. As part of that investigation, I reviewed reports prepared by Detective Wacker and documents obtained from the State of Wisconsin Elections Commission. I believe the documents received from the State of Wisconsin Elections Commission are accurate and reliable because they are maintained by the agency pursuant to law in the ordinary course of their operations. I believe the reports prepared by Detective Wacker are accurate and reliable because they were prepared in the course of his official duties.

Part of the investigative materials included a verified sworn complaint with the Wisconsin Elections Commission submitted by Jenny Toftness on June 4, 2018, and an amendment to that complaint dated June 6, 2018. I believe this complaint and amendment and the attached documents are accurate and reliable because she is a citizen witness who had personal knowledge of the information provided. I also believe the affidavits submitted with that complaint are accurate and reliable as they are sworn to under oath from citizens who have personal knowledge of the information provided.

Based upon my review of records I know that the defendant, Charisse Daniels, D.O.B. 7/8/1987, completed and filed in Madison, Wisconsin, a notarized Declaration of Candidacy on June 1, 2018, as candidate for Representative for the 37th Assembly district for the State of Wisconsin for an election to be held on November 6, 2018. On that Declaration of Candidacy Charisse Daniels listed her current address as 1510 Utah Street, Watertown, Wisconsin. Ms. Daniels also certified that she did or would meet all requirements to hold office.

Pursuant to Wisconsin Statute section 8.15(6)(b), a candidate for a state assembly seat must submit not less than 200 nor more than 400 valid signatures of electors from the specific assembly district. On June 1, 2018, the deadline for submitting nomination papers under Wisconsin Statute section 8.15(1), the Wisconsin Elections Commission received 31 pages of nomination signatures for certification from Ms. Daniels as a candidate for the 37th Assembly district. These pages listed 219 signatures. After review the State of Wisconsin Elections Commission determined that 201 of the signatures were valid. Rejection of the other signatures was based primarily on signatures being dated after the certification signature date of the circulator.

Of the 31 pages submitted by Ms. Daniels, she was listed as the circulator on 10 of those pages which listed 78 signatures.

On each of those 10 pages Ms. Daniels certified that:

I, Charisse Daniels, certify: I reside at 1510 Utah Street, Watertown, WI.

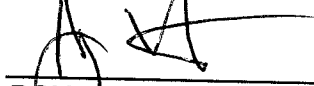
I further certify that I am either a qualified elector of Wisconsin, or a U.S. citizen, age 18 or older who, if I were a resident of this state, would not be disqualified from voting under Wis. Stat. **I personally circulated this nomination paper and personally obtained each of the signatures on this paper.** I know that the signers are electors of the jurisdiction or district that the candidate seeks to represent. **I know that each person signed the paper** with full knowledge of its content on the date indicated opposite his or her name. I know their respective residences given. I intend to support this candidate. **I am aware that falsifying this certification is punishable under Wis. Stat. s.12.13(3)(a).** (Emphasis added).

On June 4, 2018, Ms. Toftness submitted to the Wisconsin Elections Commission affidavits from 20 people who stated they did not sign the nomination papers on pages circulated by Ms. Daniels. In addition, there were three duplicate signatures. As a result of the lack of valid signatures Ms. Daniels name was not placed on the ballot for the November 6, 2018, election.

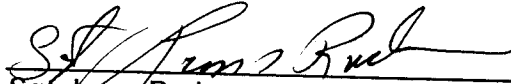
Detective Wacker made efforts to contact every person whose name appeared on the nomination papers submitted by Ms. Daniels. Detective Wacker obtained affidavits from 24 of the people named on the nomination papers submitted by Ms. Daniels which stated they did not sign the nomination papers even though the nomination form purported to show their names and signatures. In addition, he also spoke to an additional 10 people who stated that they did not sign the forms but did not want to pursue charges. Furthermore, the wrong name was used for people at two separate residences and one signature listed the address of a vacant lot. There were also others who did not respond. Lastly, Detective Wacker found 25 people who confirmed signing the nomination forms and also frequently heard people state that they would have willingly signed the forms if they had been asked.

Attached to this complaint as Exhibit 1 as examples of the 10 pages of nomination papers submitted by Ms. Daniels, are copies of pages five and eight of the nomination papers which were certified by Ms. Daniels. The names of people who are not blacked out are those who specifically told Detective Wacker, and in one case in an affidavit submitted to the Wisconsin Elections Commission, that they had not signed the nomination papers. 18 of the 20 people whose names appear on those two pages have affirmatively stated that they did not sign their name to the forms.

Subscribed and sworn to before me and
approved for filing on this 14th day of
December, 2018



ROY KORTE
Special Prosecutor for Jefferson County
State Bar No. 1019492
My commission is permanent.



Sgt. Leon Ruder
Complaining Witness

Wisconsin Department of Justice
Post Office Box 7857
Madison, Wisconsin 53707-7857
(608) 266-3067

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NOMINATION PAPER FOR PARTISAN OFFICE

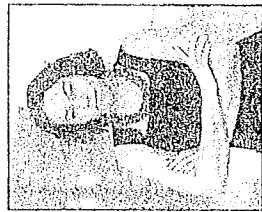
I, the undersigned, request the name of

CHARISSE DANIELS

Residing at: 1510 Utah Street, Watertown, WI 53094, in the City of Watertown, be placed on the ballot at the general election to be held November 6, 2018 as a candidate representing the Democratic Party, so that voters will have the opportunity to vote for her for the Office of

REPRESENTATIVE TO THE ASSEMBLY - 37TH DISTRICT

I am eligible to vote in the 37th Assembly District. I have not signed the nomination paper of any other candidates for the same office at this election.



Please include your e-mail address if interested in receiving periodic campaign updates.

THE MUNICIPALITY USED FOR MAILING PURPOSES WHEN DIFFERENT THAN THE MUNICIPALITY OF RESIDENCE IS NOT SUFFICIENT. THE NAME OF THE MUNICIPALITY OF RESIDENCE MUST ALWAYS BE LISTED

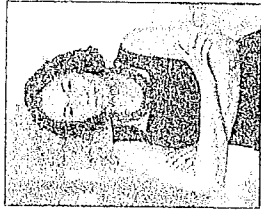
SIGNATURES OF ELECTORS	PRINT NAME	STREET & NUMBER OR RURAL ROUTE <small>Rural addresses must also include box or farm number</small>	CITY, ZIP	MUNICIPALITY OF RESIDENCE <small>Indicate town, village or city</small>	DATE OF SIGNING	E-MAIL ADDRESS	PHONE NUMBER
1. <i>Charisse Daniels</i>	Charisse Daniels	821 Brainerd St.	Watertown, WI 53094	Watertown	5/15/2018		
2. <i>Penelope Sullivan</i>	Penelope Sullivan	2301 Brainerd St.	Watertown, WI 53094	Watertown	5/15/2018		
3. <i>Anna Jant</i>	Jessica Jant	2301 Brainerd St.	Watertown, WI 53094	Watertown	5/15/2018		
4. <i>Maya Frey</i>	Frederick Frey	519 Brainerd St.	Watertown, WI 53094	Watertown	5/15/2018		
5. <i>Caroline Davis</i>	Caroline Davis	519 Brainerd St.	Watertown, WI 53094	Watertown	5/15/2018		
6. <i>Carol Demott</i>	Christopher Demott	871 Brainerd St.	Watertown, WI 53094	Watertown	5/15/2018		
7. <i>Chanelle Hest</i>	Francine Gordon	888 Brainerd St.	Watertown, WI 53094	Watertown	5/15/2018		
8. <i>Rachel Witt</i>	Rachel Witt	818 Brainerd St.	Watertown, WI 53094	Watertown	5/15/2018		
9. <i>Maureen Witt</i>	Maureen Witt	818 Brainerd St.	Watertown, WI 53094	Watertown	5/15/2018		
10. <i>D. Stal</i>	Dannastal	808 Chavennoc Cir.	Watertown, WI 53094	Watertown	5/15/2018		

I, Charisse Daniels, certify: I reside at 1510 Utah Street, Watertown, WI 53094

I further certify I am either a qualified elector of Wisconsin, or a U.S. citizen, age 18 or older, who, if I were a resident of this state, would not be disqualified from voting under Wis. Stat. § 6.03. I personally circulated this nomination paper and personally obtained each of the signatures on this paper. I know that the signers are electors of the jurisdiction or district that the candidate seeks to represent. I know that each person signed the paper with full knowledge of its content on the date indicated opposite his or her name. I intend to support this candidate. I am aware that falsifying this certification is punishable under Wis. Stat. § 12.13(3) (a).

Return to: Charisse Daniels at 1510 Utah Street, Watertown, WI 53094
Date: 5/15/2018
Signature of Circulator: *Charisse Daniels*
Page No.: 5

EXHIBIT 1



NOMINATION PAPER FOR PARTISAN OFFICE

I, the undersigned, request the name of

CHARISSE DANIELS

Residing at 1510 Utah Street, Watertown, WI 53094, in the City of Watertown, be placed on the ballot at the general election to be held November 6, 2018 as a candidate representing the Democratic Party, so that voters will have the opportunity to vote for her for the office of **REPRESENTATIVE TO THE ASSEMBLY - 37TH DISTRICT**

I am eligible to vote in the 37th Assembly District. I have not signed the nomination paper of any other candidates for the same office at this election.

Please include your e-mail address if interested in receiving periodic campaign updates.

THE MUNICIPALITY USED FOR MAILING PURPOSES WHEN DIFFERENT THAN THE MUNICIPALITY OF RESIDENCE IS NOT SUFFICIENT. THE NAME OF THE MUNICIPALITY OF RESIDENCE MUST ALWAYS BE LISTED.

SIGNATURES OF ELECTORS	PRINT NAME	STREET & NUMBER OR RURAL ROUTE <small>(Rural route boxes must also include box or line number)</small>	CITY, ZIP	MUNICIPALITY OF RESIDENCE <small>(Indicate town, village or city)</small>	DATE OF SIGNING
1. <i>Frank W. Hrusky</i>	FRANK W. HRUSKY	716 DENNEY AVE.	30014 WATER TOWN	<input type="checkbox"/> town <input type="checkbox"/> city <input type="checkbox"/> village	5/20/2018
2. <i>Karey Piotrowski</i>	KAREY PIOTROWSKI	2100 1/2 DENNEY AVE	53094 WATER TOWN	<input type="checkbox"/> town <input type="checkbox"/> city <input type="checkbox"/> village	5/20/2018
3. <i>Anthony Scob</i>	ANTHONY SCOB	211 DENNEY AVE	53094 WATER TOWN	<input type="checkbox"/> town <input type="checkbox"/> city <input type="checkbox"/> village	5/20/2018
4. <i>Margaret Scob</i>	MARGARET SCOB	211 DENNEY AVE	53094 WATER TOWN	<input type="checkbox"/> town <input type="checkbox"/> city <input type="checkbox"/> village	5/20/2018
5. <i>[Redacted]</i>	[Redacted]	[Redacted]	53094 WATER TOWN	<input type="checkbox"/> town <input type="checkbox"/> city <input type="checkbox"/> village	5/20/2018
6. <i>[Redacted]</i>	[Redacted]	[Redacted]	53094 WATER TOWN	<input type="checkbox"/> town <input type="checkbox"/> city <input type="checkbox"/> village	5/20/2018
7. <i>Toni Bohn</i>	TONI BOHN	508 DENNEY AVE	53094 WATER TOWN	<input type="checkbox"/> town <input type="checkbox"/> city <input type="checkbox"/> village	5/20/2018
8. <i>Chris Bohn</i>	CHRIS BOHN	508 DENNEY AVE	53094 WATER TOWN	<input type="checkbox"/> town <input type="checkbox"/> city <input type="checkbox"/> village	5/20/2018
9. <i>Diane Tully</i>	DIANE TULLY	201 EDINSON ST.	53094 WATER TOWN	<input type="checkbox"/> town <input type="checkbox"/> city <input type="checkbox"/> village	5/20/2018
10. <i>Bare Warner</i>	BARE WARNER	821 EDINSON ST.	53094 WATER TOWN	<input type="checkbox"/> town <input type="checkbox"/> city <input type="checkbox"/> village	5/20/2018
CERTIFICATION OF CIRCULATOR					
1. Charisse Daniels		I certify: I reside at 1510 Utah Street, Watertown, WI 53094			
(name of circulator)		(circulator's residence including street, number and municipality)			

I further certify I am either a qualified elector of Wisconsin, or a U.S. citizen, age 18 or older who, if I were a resident of this state, would not be disqualified from voting under Wis. Stat. § 6.03. I personally circulated this nomination paper and personally obtained each of the signatures on this paper. I know that the signers are electors of the jurisdiction or district that the candidate seeks to represent. I know that each person signed the paper with full knowledge of its content on the date indicated opposite his or her name. I know their respective residences given. I intend to support this candidate. I am aware that falsifying this certification is punishable under Wis. Stat. § 12.13(3)(a).

Return to: Charisse Daniels at 1510 Utah Street, Watertown, WI 53094
Signature of Charisse Daniels
Date: 5/20/2018
Page No: 8

(Circulator Email • Phone)